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10 Attorneys for Defendant
11 ELECTROLUX HOME PRODUCTS INCORPORATED

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14 UNITED STATES DISTRICT COURT OF CALIFORNIA
15
16 EASTERN DISTRICT

17 ROBERT BOVERO,
18 Plaintiff,
19 v.
20 ELECTROLUX HOME PRODUCTS
21 INCORPORATED,
22 Defendant.

23 Case No. 2:13-cv-00087-WBS-AC

24 **STIPULATION AND [PROPOSED]
25 ORDER TO EXTEND TIME TO
26 RESPOND TO INITIAL COMPLAINT
27 AND FIRST AMENDED COMPLAINT
(L.R. 144)**

28 Complaint served: Jan. 17, 2013
Current response date: Feb. 7, 2013
New response date: March 29, 2013

29
30 Plaintiff ROBERT BOVERO (“Plaintiff”) and Defendant ELECTROLUX HOME
31 PRODUCTS INCORPORATED (“Electrolux”), by and through their respective counsel, hereby
32 stipulate and agree as follows:

33 WHEREAS, on January 16, 2013, Plaintiff filed his initial Complaint in this action;

34 WHEREAS, on January 17, 2013, Plaintiff served Electrolux with a copy of the initial
35 Complaint and Summons in a Civil Action;

36 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a), Electrolux currently must
37 file and serve a response to Plaintiffs’ initial Complaint on or before February 7, 2013;

38 WHEREAS, the parties have not yet obtained any extensions as to Electrolux’s time to
39 file and serve a response to Plaintiff’s initial Complaint;

40
41 STIPULATION TO EXTEND TIME TO
42 RESPOND TO COMPLAINT
43 Case No. 2:13-cv-00087-WBS-AC

1 WHEREAS, Plaintiff has notified Electrolux that he intends to file a First Amended
2 Complaint on or before March 1, 2013 to, at a minimum, add a claim for damages to his cause of
3 action under the California Consumers Legal Remedies Act (“CLRA”);

4 WHEREAS, Electrolux does not wish to incur, and Plaintiff does not wish to cause
5 Electrolux to incur, any burden or expense in responding to the Complaint now on file that will be
6 superseded by the First Amended Complaint when it is filed;

7 WHEREAS, Electrolux also has requested from Plaintiff additional time to prepare a
8 response to Plaintiff's forthcoming First Amended Complaint, which Plaintiff intends to file on or
9 before March 1, 2013;

10 WHEREAS both parties have agreed that good cause exists to extend the time for
11 Electrolux to respond to Plaintiff's contemplated First Amended Complaint to and including
12 March 29, 2013 (28 days after Plaintiff intends to file a First Amended Complaint);

13 NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE THAT (1)
14 Plaintiff shall file his First Amended Complaint on or before March 1, 2013; (2) Electrolux need
15 not respond to the Complaint currently on file; and (3) Electrolux shall have to and including
16 March 29, 2013, to move, answer, or otherwise respond to Plaintiff's First Amended Complaint

17 || IT IS SO STIPULATED.

19 Dated: January 30, 2013

FARELLA BRAUN + MARTEL LLP

By: /s/ C. Brandon Wisoff
C. Brandon Wisoff

Attorneys for Defendant
ELECTROLUX HOME PRODUCTS INC.

24 Dated: January 30, 2013

EPPSTEINER & FIORICA ATTORNEYS, LLP

By: /s/ Stuart M. Eppsteiner
Stuart M. Eppsteiner
(as authorized on January 30, 2013)

Attorneys for Plaintiff ROBERT BOVERO, on
behalf of himself and those similarly situated

ORDER

IT IS SO ORDERED.

Dated: February 26, 2013

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT
Case No. 2:13-cv-00087-WBS-AC